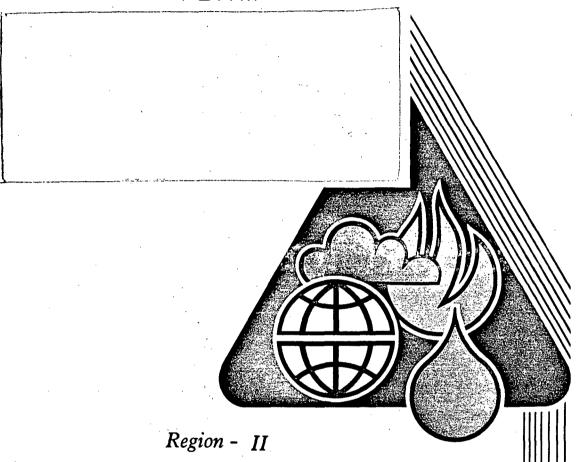


U.S. ENVIRONMENTAL PROTECTION AGENCY



ASSISTANCE TEAM



ROY F. WESTON, INC.

Spill Prevention & Emergency Response Division
In Association with Jacobs Engineering Group Inc. Tetra Tech Inc.
and ICF Incorporated





SCP CARLSTADT PRINCIPAL RESPONSIBLE PARTY CLEANUP SUMMARY REPORT

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INTRODUCTION

The SCP/Carlstadt project was a responsible party cleanup at the former Scientific Chemical Processing (SCP) facility in Carlstadt, New Jersey, where five tanks, containing an estimated 31.500 gallons of PCB contaminated liquids and sludges, were left abandoned (Photos 1 and 2). EPA determined that the release and threatened release of one or more hazardous substances from the facility could present an imminent and substantial endangerment to the public health, welfare and the environment.

Administrative Order II-CERCLA-50115, was issued to Inmar Associates, owner of the property, on October 23, 1985.

Site monitoring of this cleanup was requested of the Response and Prevention Branch by the Site Investigation and Compliance Branch, Region II, EPA. Monitoring was performed by the TAT group of Weston SPER.

OBJECTIVE

This project had two objectives:

- Remove and properly dispose of the PCB contaminated liquids and sludges of the site.
- 2) Decontaminate, and remove from the site, the tanks containing the contaminated liquid and sludge.

Accomplishing these objectives would remove the immediate threat to health and environment and would clear the area so that a separate remedial investigation could begin.

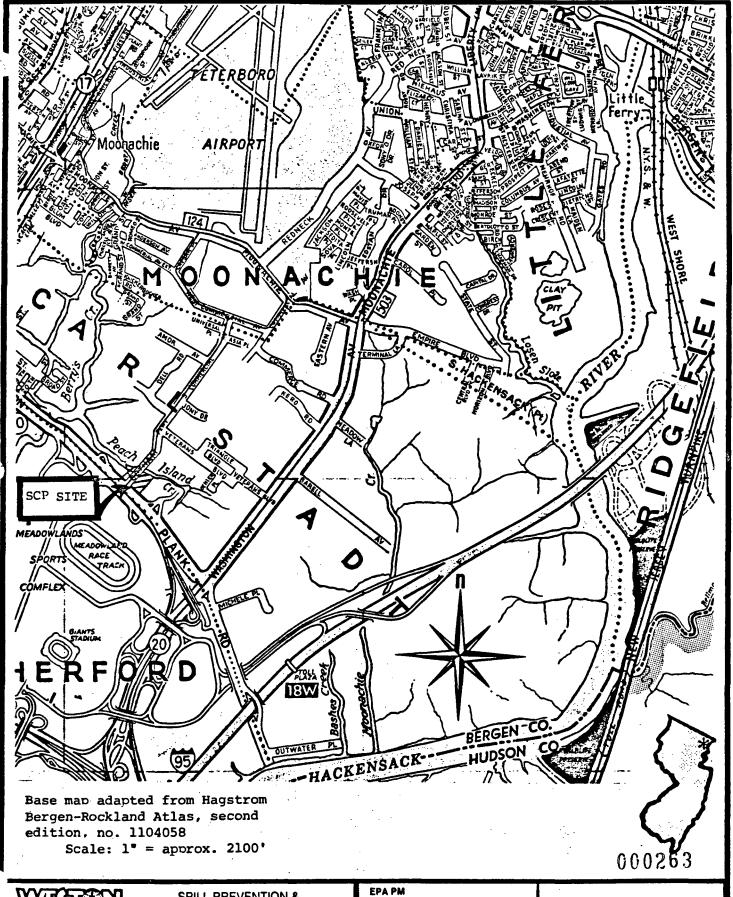
LOCATION

The site is located at the former SCP facility at 216 Paterson Plank Road, Carlstadt, Bergen County, New Jersey. It is bounded on the north by Peach Island Creek, on the east by the Carolina Trucking Facility. on the south by Paterson Plank Road, and on the west by Gotham Parkway (Figures 1 and 2).

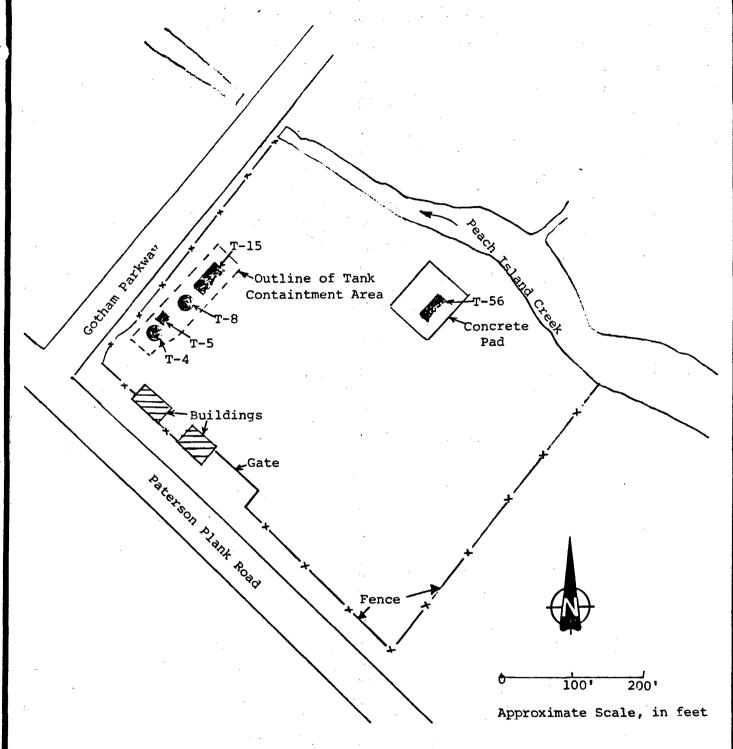
The site is readily accessed by several gates along Paterson Plank Road.

TIME AND SCOPE OF OPERATIONS

Removal efforts began on April 2, 1986, when the first of three truckloads of liquid was drawn from the tanks and taken to the Chemical Waste Management (CWM) facility in Chicago for incineration.



SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM Harris	Figure l
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	TAT PM Simonsen	Site Location



Notes;

- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

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SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPAPM R. Harris	Figure 2
In association with	TAT PM	
ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	Site Map

On April 18, 1986, Chemical Waste Management, acting as contractor for Inmar Associates, sampled the sludges in each of the five tanks. Four sets of splits of the samples were made; the first set went to CWM, the second to Region II, EPA, and the third to Intech Biolabs. The fourth set was retained by Inmar Associates, but never analyzed. This set was subsequently disposed of along with the sludges of their respective tank.

The PCB values obtained by each lab, for the sludge of any given tank, ranged considerably (see Appendix 1 for values), probably because of the heterogeneity of the sludge. For example, one analysis of T-4 sludge showed a value of 5,900 ppm but when the sample was homogenized, the subsequent value was found to be less than 500 ppm. However, it was possible to make a determination of disposal methods for the sludges, based on those ranges.

The sludges of T-4 and T-15, having a PCB concentration of less than 500 ppm, were deemed suitable for disposal by landfill, and were subsequently removed to the CWM landfill at Emelle, Alabama. PCB concentrations in excess of 500 ppm necessitated the incineration of sludges contained in tanks T-8 and T-56. These sludges were subsequently removed to the CWM incinerator in Chicago, Illinois.

The sludges of T-5 currently present a problem: PCB levels are far too high for this material to be landfilled, but the sludge also contains lead, mercury, chromium, and cadmium, making this material unacceptable for incineration (see Appendices 1 and 5). Until this issue can be resolved, the tank and it's sludge remain on site, although stored in a more secure manner than it was at the start of removal operations.

At this time, the tank is being stored in a roll-off, which has been lined with plastic sheeting, and covered with a heavy-duty tarp. The tarp is held securely in place by a series of black rubber shock cords. PCB warning stickers have been affixed to the tarp and are readily visible. Additionally, the tank/roll-off combination has been moved onto the cement pad formerly occupied by T-56. Tank T-5 was stored in this fashion on December 15, 1986, after EPA demanded that the tank be stored in a more secure manner. Prior to that demand, the tank had remained in the same setting and condition that it had when operations began in April. For additional details on this situation see Appendix 5.

Actual cleanup operations began during the week of July 14, 1986, and continued into September, 1986. During this period, Tanks 4, 8, 15 and 56 were emptied of their respective sludges, which were then drummed, stabilized, and removed for disposal.

Decontamination of the tanks themselves began in August, and continued into September, at which point the tanks were cut up and removed as scrap, except for T-5, which remains on site.

SAFETY PRACTICES

Most site activity was conducted in Level "C" protective clothing except the period during which sludge from T-8 was worked; during this time workers were in Level "B". The decision to upgrade the level of protection was based on air monitoring which showed significant increases of organic vapors when the sludge was being mixed. Level "B" was also used on those occasions when workers entered the tanks for inspection, or final sludge removal.

Use of this level of protective gear introduced a serious threat of heat exhaustion. The operations were conducted during summer months with air temperatures often climbing into the low 90's accompanied by high humidity. To try and compensate for this, working hours were shifted so that operations would begin at 0600 hours, and stop at about 1500 hours. Occasionally, however operations continued until about 2000 hours.

The heat, combined with a lack of proper supervision introduced an additional complication: workers began to ignore proper safety procedures. They often failed to properly duct tape openings of protective clothing, and frequently substituted uncoated tyvecs for coated tyvecs or saranex. Because of concern over these issues by the TAT member monitoring the site, two site safety audits were conducted, and the EPA OSC expressed this concern to both Inmar Associates and Chemical Waste Management. The expression of these concerns resulted in greatly improved safety practices, with work crews finally working according to accepted safety practices.

MATERIALS HANDLING

Materials at the site were divided into four categories for disposal purposes:

- 1) Liquid waste
- 2) Low level sludge
- 3) High level sludge
- 4) Low level solid debris

1) Liquids

Liquids at the site consisted of rainwater which, over time, had accumulated in the tanks, and also water used for decontamination. All of these liquids were removed to the CWM incinerator in Chicago, Illinois.

Liquids were first removed at the very start of operations (Photo 3) because the accumulated rainwater had effectively created a "water blanket" on top of the sludges. This "water blanket" had to be removed before the sludges could be accessed. Disposal of liquids was essentially an on-going process, because water continued to accumulate from rainfall, and regular periods of decontamination. To handle this accumulation, T-4, after it had been emptied of its sludge, was used as a storage container until near the end of operations. Then T-4 was off loaded, decontaminated, and removed. The stored liquids were then sent to Chicago for incineration.

2) Low Level Sludges

This category consisted of those sludges from T-4 and T-15, which, having a PCB concentration of less than 500 ppm (Intech Lab analysis showed 15 ppm and 135 ppm for T-4 and T-15, respectively), were deemed suitable for disposal by landfilling under the regulations of the Toxic Substances Control Act (TSCA). Because sludges from both of these tanks were to be disposed of in the same manner, they were effectively treated as one waste.

First, the sludges were pumped onto a vac-truck, and then off-loaded from the vac-truck into 55-gallon steel drums. As operations progressed, the sludge of T-15 proved to be too viscous for pumping. As a result, the top of T-15 was removed and the sludge was scooped out with a backhoe (Photo 4). The sludge was then poured into the drums through a hopper constructed of plywood, which was used in order to minimize spillage.

After all of the drums were partially filled with sludge, kiln dust was added to induce stabilization. The mixture was then allowed to stand, and was periodically inspected for free liquids: if free liquids were discovered, additional kiln dust was added until stabilization was achieved (Photo 4). When all of the drums were believed by CWM personnel to be stable, they were shipped for disposal to the CWM landfill facility at Emelle, Alabama. Total drum count was 344.

3) High Level Sludge

This group consisted of sludges from T-8 and T-56 which, having PCB concentrations of greater than 500 ppm, were required by TSCA regulations to be disposed of by incineration (Intech Lab analysis showed PCB values of 4,650 ppm for T-8, and 1,240 ppm for T-56). Sludges from these tanks were shipped by truck to the CWM incinerator at Chicago, Illinois for disposal.

Sludges from T-56 were removed by scooping the sludge out with a backhoe, after a portion of tank's top had been removed (see Photo 6), and loading the sludge into a plywood sluiceway which had been constructed for the site. At this point, sawdust was mixed in to stabilize the sludge, and improve its ability to incinerate. The subsequent mixture was then loaded into a total of 92 thirty gallon plastic drums, which were shipped for disposal.

Sludge from T-8 was handled in the same manner, however, because of it's higher PCB concentration, the use of 3.5 gallon buckets was required. A total of 1,027 such buckets were loaded and shipped for disposal.

4) Low Level Solid Waste

This waste consisted of soil contaminated by spillage or removed as a precautionary measure, as well as discarded protective clothing and miscellaneous contaminated debris. Approximately 90 cubic yards of this material was accumulated, all of which was stored in covered roll-offs, (Photo 7) until it was removed to the CWM landfill facility at Model City, New York.

Disposal methods for all wastes are summarized in Appendix 3.

TANK DECONTAMINATION AND DISPOSAL

All tanks were hand scraped and washed down with a solution of penetone and water which was run through a high pressure nozzle, commercially known as a "blaster". In order to control the accumulation of used wash solution, washing was done within the tank whenever possible, with the accumulated solution later being pumped out into a tanker. Some of the relatively smaller pieces were washed down after having been placed in T-15, which acted as a catch basin. These pieces were then placed on plastic sheeting and allowed to dry (Photo 8).

Although the area where the washing took place was bermed, many pieces of debris were blown from the tanks because of the high pressure nozzle. Therefore, to be sure all contaminated debris was removed from the site, all of the soil in the general area of the washing was scraped and subsequently disposed of as low level solid waste.

Next, all of the tanks were visualy inspected, and wipe samples for PCB's were taken. Usually, the wipe samples were taken over several parts of the tank, and in some cases, were deliberately biased so that the "least clean" area was sampled (all of the tanks visually appeared quite clean). All of the wipe sample results were found to be "none-detected" for PCB's.

At this point, all of the tanks were considered by the OSC to be clean and suitable for removal. The tanks were then cut up using a welding torch and removed by a scrap metal dealer (Photos 9 and 10).

SPILLS

Two spills of material associated with this site occurred during site operations. The first occurred on site when the back of a vacuum truck used for off loading the tanks was inadvertently opened by a worker: an estimated 3,000 gallons of material was spilled (Photos 11 and 12). All of the material was immediately vacuumed up and was later disposed of along with the rest of the sludges from the tanks from which they came (T-4) and T-15.

Soil contaminated by this spill was scraped up and stored in covered roll-offs until disposal could be arranged. Sample analysis by CWM showed PCB and flash point levels were low enough that the soil could be landfilled, and it was later removed to the CWM landfill at Model City, New York.

A second spill and clean-up occurred in Pennsylvania when the above material was in transit to the landfill. Apparently, while the soil was being stored it accumulated a good deal of rain water, despite the fact that the roll-offs were well covered by tarps. Although the roll-offs were previously drained by pumping, and kiln dust had been added to help stabilize the soil and water mix, enough water apparently remained in the soil for leakage to occur during transport. This leakage was probably aided by the pressure exerted by the weight of the material on itself.

APPENDIX 1

LAB ANALYSIS



ANALYTICAL LABORATORY REPORT

Chemical Waste Management, Inc. Technical Center 150 W. 137th Street Riverdale, IL 60627

Sample No: 04.2324.6

Sample ID: Solvent Sludge - Tank #74 - #014 = ESD 688532

PARAMEIER	BESULI	DEIECTION TIMIL
Aroclor 1016	ND A CLASS	.02
Aroclor 1221	/ ND	.02
Aroclor 1232 Aroclor 1242	ND ND	.02 .02
Aroclor 1248	15.D (5920)	.02 (5)
Aroclor 1254 Aroclor 1260	ND ND	.02 .02
HI.OCIOL 1500	110	• 02

Date Reported: 5-15-86

Attested to by: L.W. HAYMON Ph.D.

Vender Hay



ANALYTICAL LABORATORY REPORT

Chemical Waste Management, Inc. Technical Center 150 W. 137th Street Riverdale: IL 60627

Sample No: 04.2322.6

Sample ID: Solvent sludge - Tank #T8 - #008 = ESD 088530

PARAMEI	EB .	BESULI	DE:	IECIION L	IIII
		ppm		PPM	
-Aroclor	1016	ND	•	.02	
Aroclor	1221	ND		.02	
Aroclor	1232	ND		.02	*
Arcelor	1242	ND	•	.02	
Aroclor	1248	ND		.02	•
Aroclor	1254	ND		.02	
Aroclor	1260	4650.0	(2420 0)	.02	(5)

Date Reported: 5-15-86

Trimble Hoy



ANALYIICAL LABOBATORY REPORT

Chemical Waste Management, Inc. Technical Center 150 W. 137th Street Riverdale, IL 60627

Sample No: 04.2323.6

Sample ID: Solvent sludge - Tank #T5 - #011 EESD 08853/

PARAMEIER -	RESULI DE	IECIION LIMII
	PPm	DD M
Aroclor 1016	ND	.02
Aroclor 1221	, ND	.02
Aroclor 1232	ND	.02
Aroclor 1242	ND	02
Aroclor 1248	32,100.0	•02 .
Aroclor 1254	ND c	. .D2
Aroclor 1260	995.0 (170,725)) .02 (< 62)

Date Reported: 5-15-86

Laure Hon



ANALYTICAL LABORATORY REPORT

Chemical Waste Management, Inc. Technical Center 150 W. 137th Street Riverdale, IL 60627

Sample No: 04.2320.6

Sample ID: Solvent sludge - Tank #T56 - #D02 = ESD '088526

PARAMETER -	BESULI PPm	DEIECIION LIMII
Aroclor 1016	ND	.02
Aroclor 1221	ND	.02
Aroclor 1232	ND	.02
Aroclor 1242	ND	.02
Aroclor 1248	ND	.02 .
Aroclor 1254	ND .	.02
Aroclor 1260	1240.0 ppm (243	30) .02 (5)

Date Reported: 5-15-86

Thender I



ANALYIICAL LABORATORY BEPORT

Chemical Waste Management, Inc. Technical Center 150 W. 137th Street

Riverdale, IL 60627

Sample No: 04.2321.6

Sample ID: Solvent sludge - Tank #T15 - #805 = ESO OF8527

PARAMETER	RESULI PDM	DETECTION LIMIT
Aroclor 1016	ND	.02
Aroclor 1221	ND ^	.02
Aroclor 1232	ND	.02
Aroclor 1242	ND /	.02
Aroclor 1248	85.0 ((62)	.02 (62)
Aroclor 1254	ND C	.02
Aroclor 1260	47.0 (<62)	.02 (62)

Date Reported: 5-15-86

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ADDRESS	Techn	ical Center	<u> </u>	-	ENRAC EAST/RUN	N MIS		
		·			RK.NJ	יר פוס	<i>0</i> 13	
DATE SAMPLE RECEIVED AT LAB					; ENC SITE: IN ENT SLUDGE/T@		013	
LAB SAMPLE NUMBER ASSIGNED						•		
CERTIFICATION: Except as explicitly not analytical equipment specified or approve the province of the second secon	id as the wost tec	eni "Tesi Melhods	tot the Evaluatio	r of Soud Wi	ection and supervision, using san sale, Physical/Chemical Methods,	"SW 646, USEPA (nd analytical metho Dilice of Solid Was	ids and le This
teboratory follows a quality assurance con	mo program, sa	ricod a semble ci	ram or costody b	ocean4		[[] m/	-1.1-	,
DATE OF REPORT:			\$I G(SAUTAN	1111/		5/4/84	,
LAB MANAGER NAME			-		1000		9/1/	
PHYSICAL CHARACTERISTICS OF WAST	Æ	Inci	dental					
SAMPLE VOLUME COLOR	_ ~ 6	· ODOR:	NONE)	MILD	PHYSICAL STATE @ 70°F	LAYERS	FREE LI	OUIDS
Dr. D	صبهرع	79:	☐ STRONG	`	X SOLID SEMI-SOLI	BHLAYE	M	. □ wo
Die Er	صبيد	م ا	• • • •	. [•	1 2, 5	PHASED VOLUM	_
	50UU-~	- ZO BESCRIB	ŧ	!	T LIQUID POWDER	LI SINGLE	PHASED VOLUMI	رعده
Test	As Received	Extraction Procedure	Date of Analysis		Test	As Received	Extraction Procedure	Date of
Specific Gravity	0.99	V.10CE00.6	ANIGH SIS			Neceived	Fiocedure	Analysis
рН	70							
Acidity % as								
Alkalinity % as	<u> </u>			Phenois.	mg/l			
G mo/l	1				as CN Total mg/l	410		
Total lids @ 105°C	15 522			Cyanides	, as CN Free mg/t	<u> </u>		
Total Dissolved Solids mg/l	المحددت			Nitrogen	Ammonia, as N mg/l	<u> </u>		
Residue on Evaporation @ 180°C			:		Idani Nitrogen as N mg/l			
1-200 do	-1. 70			·				
Flash Point F*	-70			Total Alka	linity, P as CaCO, mg/l			
Ash Content, on ignition (%)	10 X 5%				slinity M as CaCO, mg/l	<u> </u>		
Heating Value, BTU/Ib	119.77.				dness as CaCO ₁ , mg/l	<u> </u>		
"Acid Scrub," gNaOHig	196				Hardness, as CaCO mg/l im Hardness, as CaCO, mg/l			
Arsenic, as As, mg/l	0.7							
Barium, as Ba, mg/l	245			Tra	Elina COTL	41.2.0		
Bromium as Br, mg/l				Oil and G	irease, mg/l			
Cadmium, as Cd, mg/l	KO10				in asin	₹50.		
Chromium, Total as Cr. mg/l	16.9				mary costs	3.30		
Mexavalent Chromium as Cr, mg/l	2/5			Aldrin, m		<u> </u>		
Cooper as Cu. mg/l	3.69			DDT . mg	ene mg/l	! 		
ron, Total as Fe, mg/l ron, dissolved, as Fe, mg/l				Dieldrin, i		<u> </u>		
.ead. as Pb. mg/l	147			Endrin, m				
danganese, as Mn. mg/l				Heptachi		·		
Aagnesium, as Mg, mg/l				Lindane.	mg/l			
Aercury, as Hg, mg/l	1:1:317				thior, mg/l			•
ficket, as Ni, mg/l	7.73			Toxapher				
elenium, as Se, mg/l	5.30			Parathion 2.4, D. mo				- 0
Hv Ag. mg/l	90.1				(Silvex), mg/l		0002	* (:
El Vilian COCE	063		>		OI TOTAL	161.		
X JONIM COX	M 30			5.4	1-5-1-	114,		
carbonates, as HCO, mg/l	•			<u> </u>	SELLIFE	40.60	1	1
otal Sulfur, mg/1	3430			<u>. ججم</u>	360.	4.41	I VA	48
norides, as CI, mg/I T (71)	33i00.				200-502.6		17 (4'
ourides, as F, mg/l TCH PL	1.31			- 	7/11/2 - NY	<u> </u>		i
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Tech Center | 2298

WEIGHT & SOLVEITS

Trichiorofluoromethane	Hethyl Isobutyl Ketone <u>6,3</u>
Ethyl Ether	Tetrachloroethylene 0.3
ethanol	Butyl Acetate
1,1,2-Trichloro-1,2,2-	Ethylbenzene 0.2
trifluoroethane	Xylenes /
Cthanol	Btyrene
	2-Ethoxyethanol Acetate
titliylene Chloride 0.5	2-Butoxyethanol
sopropanol	Cyclohexanone 11,
arbon Tetrachlorida	Chlorobenzene
thyl Acetate :	o-Dichlorobenzene
ethyl Ethyl Ketone . 0.8	Hydrocarbons C7-16 4
,1,1-Trichloroethane	High-boiling organics
enzene 0.9	(B.P. > 290°C) 3
richloroethylene 0.φ	Other Solvents:
sobutanol	chloroform o.4
-Butanol 0.1.	1,2-dichloroothan + 0-2
oluene A	CaBenzenes C.4
-Ethoxyethanol	Dichlerobenzene 0.2
•	1sopherch e C.3 Naphthalene 006
etection limit for individual compon	ents is approximately 0.1% by weight.

Comments

3.739 + 3.86g (S-

This Report is inte	AL WASTE ANALYSIS RI nded for the sole use and benefit of Waste A concerning significance of the reported data to	denagorient and its companies.	E PROFILE SKEET CODE
LABORATORY NAME:	Chemical Waste Management	26002287 PROF: ENR SCF/ENRAC EAST/RON MIS	04/23/86
ADDRESS.	Technical Center	NEWARK, NJ	
DATE SAMPLE RECEIVED AT LA	·	SRCE: ENC SITE: INC ALA SOLVENT SLUDGE/T5	010

SIGNATURE

LAB MANAGER NÄME:. PHYSICAL CHARACTERISTICS OF WASTE Incidental LAYERS MULTHLAYERED SAMPLE VOLUME COLOR ODOR: NONE MILD PHYSICAL STATE @ 70"F FREE LIQUIDS TYES KNO SOLID SEMI-SOLID ☐ STRONG - BI-LAYERED

Test As Received Procedure Analysis Test Received Procedure Analysis Pr			DESCRIB	E	D LIQUID D POWDER	SINGLE	PHASED VOLUM	E
Action A	Test				Test			
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So D	Alke"-ily % as			<u> </u>	Phenois, mg/l			
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Ash Content, on Ignilition (%) 33.60% Total Alkalinity M as CaCO, mg/l realing Value, BTU/lb (FHO) Total Mardness as CaCO, mg/l Total Mardness, as CaCO, mg/l Calcium Mardness, as CaCO, mg/l Calcium Mardness, as CaCO, mg/l Magnesium Mardness, as CaCO, mg/l Magnesium, as CaCO, mg/l Magnesium, as CaCO, mg/l Magnesium, mg/l Mardness, as CaCO, mg/l Magnesium, mg/l Magnesium, mg/l Magnesium, as Mg, mg/l Magnesium, as Se, mg/l Magnes	Trater as Hoz			<u> </u>				
Total Mardness as CaCO, mg/l Acid Scrub, "gNaONig Discrub, "gNaONig Asanic, as As. mg/l Barium, as Ba, mg/l Bromium as Br, mg/l Total as C, mg/l Ton Jotal as C, mg/l Ton Jotal as Fe, mg/l Ton, dissolved, as Fe, mg/l Alagnase, as Mn, mg/l Ala	Flash Point F*				Total Alkalinity, P as CaCO, mg/l			
Acid Scrub, "gNaOMig Alternative At 2730 Arsenic, as As, mg/l Arsenic, as As, mg/l Jonium, as Ba, mg/l Jonium, as Ba, mg/l Jonium, as Cd, mg/l Jonium	Ash Content, on Ignition (%)	23.627			Total Alkalinity M as CaCO, mg/l			
Assentic, as As. mg/l	Heating Value, BTU/Ib	18940			Total Hardness as CaCO ₃ , mg/t			
Arsenic, as As, mg/l Bartum, as Ba, mg/l 2000 3romium as Br, mg/l 2000 20	"Acid Scrub," gNaOHig				Calcium Hardness, as CaCO mg/l			
Arsanic, as As. mg/l 3arium, as 8a, mg/l 3arium, as 8a, mg/l 2dmium, as Cd. mg/l Chromium, Total as Cr, mg/l Assavalent Chromium as Cr, mg/l Copper, as Cu, mg/l Copper, as Cu, mg/l Con, Total as Fe, mg/l aad, as Fe, mg/l Con, dissolved, as Fe, mg/l Can, as Mg, mg/l Copper, as Cu, mg/l Copper,	Aluminum as Al	2930			Magnesium Hardness, as CaCO, mg/l			
Stomium as Br, mg/l		7.09						
Sadmium, as Cd. mg/l Chromium, Total as Cr, mg/l Assavalent Chromium as Cr, mg/l Sopper, as Cu, mg/l Con, Total as Fe, mg/l ron, Total as Fe, mg/l and as Pe, mg/l Aldrin, mg/l DOT, mg/l Dotty mg/l Deldrin, mg/l Endrin, mg/l Anganesse, as Mn, mg/l Anganesse, as Mn, mg/l Anganesse, as Mn, mg/l Incet, as Ni, mg/l Ilickel, as Ni, mg/l Il	Barlum, as Ba, mg/l	26201			·			
Sadmium, as Cd. mg/l Chromium, Total as Cr, mg/l Assavalent Chromium as Cr, mg/l Sopper, as Cu, mg/l Con, Total as Fe, mg/l ron, Total as Fe, mg/l and as Pe, mg/l Aldrin, mg/l DOT, mg/l Dotty mg/l Deldrin, mg/l Endrin, mg/l Anganesse, as Mn, mg/l Anganesse, as Mn, mg/l Anganesse, as Mn, mg/l Incet, as Ni, mg/l Ilickel, as Ni, mg/l Il	3romium es Br, mg/l				Oll and Grease, Tight 9_	23.67		
Shromium, Total as Cr, mg/l Vesavalent Chromium as Cr, mg/l Sopper, as Cu, mg/l Sopper, as Cu, mg/l Ton, Total as Fe, mg/l Ton, dissolved, as Fe, mg/l Lead, as Pb, mg/l Angense, as Mn, mg/l Angense, as Mn, mg/l Angense, as Mn, mg/l Arecury, as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Angense, as Mn, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Illusian (Chromium as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Illusian (Chromium as Mg, mg/l Ilckel, as Nl, mg/l Solution (Chromium as Mg, mg/l Illusian (Chr	Cadmium, as Cd. mg/l	98.7						
Hexavalent Chromium as Gr, mg/l Copper, as Cu, mg/l Con, Total as Fe, mg/l Ion, dissolved, as Fe, mg/l Endrin, mg/l Lindane, mg/l Ianganese, as Mn, mg/l Ianganese, as Mn, mg/l Idaquesium, as Mg, mg/l Iccel, as Ni, mg/l Ilive' g, mg/l Inc, as Zn, mg/l Inc, as Zn, mg/l Inc, as Zn, mg/l Incel Day Andrew Mg/l		7235					,	
Copper, as Cu, mg/l ron, Total as Fe, mg/l ron, dissolved, as Fe, mg/l ead, as Po, mg/l danganese, as Mn, mg/l fercury, as Mg, mg/l fercury, as Mg, mg/l elenium, as Se, mg/l elenium, as Se, mg/l for mg/l fo	Hexavalent Chromium as Cr. mg/l				Aldrin, mg/l			
ron, Total as Fe, mg/l ron, dissolved, as Fe, mg/l ead, as Pb, mg/l Aanganese, as Mn, mg/l Aanganese, as Mn, mg/l Aercury, as Mg, mg/l electury, as Mg, mg/l fercury, as Mg, mg/l lickel, as NI, mg/l elenium, as Se, mg/l Perathion, mg/l Ilive g, mg/l Perathion, mg/l 2,4, D, mg/l Inc., as Zn, mg/l Inc.,	Sopper, as Cu. mg/l	2830						
ron, dissolved, as Fe, mg/l sed, as Pb, mg/l sed, as Rin,								
ead. as Pb. mg/l Angenese, as Mn. mg/l Angenese, as Mn. mg/l Idagnesium, as Mg. mg/l Idagnesium, as Mg. mg/l Idagnesium, as Mg. mg/l Idectry, as Mg/l Identry, as Mg. mg/								
Aangensee, as Mn, mg/l Aagnessum, as Mg, mg/l Lindane, mg/l Lindane, mg/l Lindane, mg/l Methosychlor, mg/l Ilickel, as Mi, mg/l etentium, as Se, mg/l Ilive' g, mg/l Inc, as Zn, mg/l		(4)(4)						
Lindane, mg/l Toxaphene, mg/l Toxaphene, mg/l Perathion, mg/l Perathion, mg/l Perathion, mg/l Lindane, mg/l Lindane, mg/l Perathion, mg/l Perathion, mg/l Lindane, mg/l Lindane, mg/l Perathion, mg/l Perathion, mg/l Lindane, mg/l Lindane, mg/l Perathion, mg/l Lindane, mg/l Perathion, mg/l Lindane, mg/l Lindan		90.1.2						
Hercury, as Hg, mg/l Ilchel, as Ni, mg/l Ilchel, as Ni, mg/l Etentium, as Se, mg/l Ilve' g, mg/l Inc, as Zn, mg/l				, , , , , , , , , , , , , , , , , , ,				
Itchel, as NI, mg/I elenium, as Se. mg/I ilve' g. mg/I inc, as Zn, mg/I ILLIAN COBE HISI vertonates, as HCO, mg/I vertonates, as CI, mg/I vorides, as CI, mg/I curides, as F, mg/I COCO Tokaphene, mg/I Persinion, mg/I 2,4, D. mg/I 2,4, D. mg/I 2,4, D. mg/I 2,4, S TP (Silvex), mg/I PCB's, mg/I PCB's, mg/I MOUT SALCIO ACCURACY OLAI Sulfur, mg/I HOCO OURIGES, as CI, mg/I TOKAN O.F.— MOOT NO LOCK OURIGES, as F, mg/I O.F.— MGOOT NO LOCK OURIGES, as F, mg/I O.F.— MOOT NO LOCK OURIGES, as F, mg/I O.F.—		190	· · · · · · · · · · · · · · · · · · ·					
elenium, as Se. mg/l live: g. mg/l nc, as Zn, mg/l live: g. mg/l nc, as Zn, mg/l live: g. m								
100 100		-	\					
Inc. as Zn. mg/l LA SALATICO BE H. 51 PCB's. mg/l Am. h b/ 1242 32300 // Attractionales, as MCO, mg/l OLA Sulfur, mg/l H970. Sources as Cl. mg/l T/444 1/5000 Ourides, as F, mg/l T/444 879. O.F.— March 1240 1/6000			' ·					~ ^
Sulfur of BE 4.51 PCB's mg/l Am hor 1242 32300. // Sulfur min of K 391 Carbonates, as HCO, mg/l OLAI Sulfur, mg/l 4930. Worldes, as CI, mg/l 71444 109000 Ourides, as F, mg/l TOWN 879. OF - March 200 (10)	 ,					-	1 0002	78
OLAI Sulfur, mg/1 4970. Sources as CI, mg/1 T/444 1/5000 Ourides, as F, mg/1 T/444 879. O.F.— Mary Living 100 (100)						32300	11	
oLal Sulfur, mg/1 4930. Suito storides, as F, mg/1 7048 879. O.F.— Mary Look Look O.F.— Mary Look O.F.—		391				altu	LIEU.	1
oLal Sulfur, mg/1 4930. worldes, as CI, mg/I TINAN 105000 ourldes, as F, mg/I TONN 879. O.F.— March 1000000000000000000000000000000000000				\		- 12	LVIII L	スー
ourides, as El, mg/l TOYAL 879. O.F Marsh 10000		10,30				7-61-1		
ourides, so F, mg/1 TOUR 879. O.F Mars 120 vice (ir)								
					D.F- March	1 4 0 0	0.25	
	trates, as NO, mg/l	- 			1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	- 230 x x	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	

36002287 PROF: ENR SCP/ENRAC EAST/RON MIS

SRCE: ENC SITE: INC ALA NEWARK, NJ

SOLVENT SLUDGE/T5

WEIGHT & SOLVENIS

_			•	
Trichlorofluoromethane	·		Methyl Isobutyl Ketone	
Ethyl Ether			Tetrachloroethylene	
Methanol	·	•	Butyl Acetate	
1,1,2-Trichloro-1,2,2-			Ethylbenzene	0.04
trifluoroethane		•	Xylenes _	0.2
Ethanol			Styrene _	
Acetone		:	2-Ethoxyethanol Acetate	
Methylene Chloride			2-Butoxyethanol	
Isopropanol		•	Cyclohexanone	
Carbon Tetrachloride			Chlorobenzene	
Ethyl Acetate			o-Dichlorobenzene	0.1
Methyl Ethyl Ketone	0.08		Hydrocarbons (C/10/2)	2
1,1,1-Trichloroethane			High-boiling organics	
Benzene	•		(B.P. >290°C)	7.7
Trichloroethylene	·		Other Solvents:	8/91
Isobutanol		a de la companya de l		
N-Butanol				
Toluene	c 4			
2-Ethoxyethanol		· :		
,- .		•		

Detection limit for individual components is approximately 0.1% by weight.

A Blank = Not Detected.

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115 .
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SPECIAL WASTE ANALYSIS REPORT

.tis Report to Intended for the sole use and heretit of Weste Management and its companies. No representation concerning significance of the reported data is made to any other person or entity.

	WASTE PROFILE SAFET CODE
• •	

				•			
LABORATORY NAME:		e Manageme	nt	86002286 PROF: ENR		04/23/8	ေ
	Technical	Center		SCP/ENRAC EAST/RON	MIS		_
ADDRESS			•	NEWARK, NJ			
DATE SAMPLE RECEIVED AT LAB				SRCE: ENC SITE: INC	ALA	007	
				SCLVENT SLUDGE/T48		•	
AB SAMPLE NUMBER ASSIGNED	at easitical	data recovered balo-		under my direction and supervision, using sam	ale escentine e	ad analydinal math	-44
enalytical equipment specified or approve	d in the most rec	eni "Tesi Melhods	for the Evaluation	m of Solid Waste, Physical/Chemical Methods.	" SW 846, USEPA	Office of Solid Wat	ods and He This
aboratory follows a quality assurance for	C'A	luding a sample cf	en of custody p	riocedure.	-	•	
DATE OF REPORT:	100		\$JG	NATURE.	lein	4.	
AB MANAGER NAME:				(0). 2.	luci		-
MYSICAL CHARACTERISTICS OF WAST		Incl	dental	X	Laurene	I I anno	
· 'DibRo	ے عنص	1294 000A:	LI NONE	MILD PHYSICAL STATE @ 70-F	LAYERS	YERED	IOUIDS
19t prasic	26120	20	STRONG	V SOLID SEMI-SOLI	17-	TE TE	s 🔲 no
	7.,		· Stri	2 LOUID POWDER	J —	PHASED VOLUM	
Brix 50	حمد	1 DESCRIB	مرت ا	Q LIQUID POWDER	I LI SINGLE	AMAZED I AOLOM	, <u> </u>
Test	As Received	Extraction	Date of	Test	As	Extraction	Date of
ecille Gravity	1.07	Procedure	Analysis		Received	Procedure	Analysis
ecific Gravity	$\mathbb{L} \times \mathbb{L}$						
dity & ad	PU						
dity % as	 			Phenois, mg/l			
0.6 11				Cyanides, as CN Total mg/l	210		
).D. w				Cyanides, as CN Free mg/l			
el Sollos @ 105°C	36.197						
at Dissolved Solids mg/l				Nitrogen Ammonia, as N mg/l			
sidue on Evaporation @ 180°C	1			Total Kjeldahi Nitrogen as N mg/l			
rates as 40%	5.19	,					
sh Point F*	2312			Total Alkalinity, P as CaCO, mg/l			
Content, on ignition (%)	592%			Total Alkalinity M as CaCO ₃ , mg/l			
eting Value, BTU/lb	9418.			Total Hardness as CaCO, mg/l			
ild Scrub," gNeOH/g				Calcium Hardness, as CaCO mg/l			
Punine-cope.	1080.			Magnesium Hardness, as CaCO, mg/l			
enic, as As, mg/l	1.11		·				
ium, as Bs. mg/l	434.						
mium as Br, mg/l				Oil and Grease, frigit 7.	18.87.		
Imtum, as Cd., mg/l	93.9						
omium, Talel es Cr. mg/l	943.						
ravalent Chromium as Cr, mg/l				Aldrin, mg/l			
oper, as Cu. fng/l	148.			Chlordane, mg/1			
, Total as Fe, mg/l				DDT , mg/l			
n, dissolved, as Fe, mg/l				Dieldrin, mg/l			
d, as Pb, mg/l	3750.			Endrin, mg/l			
nganese, as Mn, mg/l		7 77		Heptachlor, mg/l			
pnesium, as Mg, mg/l				Lindane, mg/l			
cury, as Mg, mg/l	0.026			Methoxychlor, mg/l			
kel, as NI, mg/l	45.9			Toxaphene, mg/l			
nium, as Se, mg/l	5.91			Parathion, mg/l			
er er mgfl	KO.15			2.4, D. mg/l		0.0	12.01
as, mg/l	413.			2, 4, 5 TP (Silvex), mg/l		00	0600
an lim asse	2.26		4	PCB . MON ARCHER DXC	2.3.8		
oto siencox.	644			المنافق المنطبط	- David	والاركايان	
erbonates, as HCO, mg/l				ring mer Dis &	3	والاسالاي	
tal Sulfur, mg/l	2160			30/4/30.2			<u>.</u>
orides, se Cl. mg/l TC++1	36200						
urides, as F, mg/l TUTTE	5725			SCOW-MOJER	1-341)		
				M. 7. 19-11 0 = 53	211.3	[·	1

86002286 FROF: ENR

SCP/ENRAC EAST/RON MIS

NEWARK, NJ

SRCE: ENC SITE: INC ALA SOLVENT SLUDGE/TAS

007

WEIGHT & SOLVENTS

Trichlorofluoromethane	*	Methyl Isobutyl Ketone	0.2
Ethyl Ether	•	Tetrachloroethylene	
Methanol		Butyl Acetate	0.1
1,1,2-Trichloro-1,2,2-		Ethylbenzene	0.1
trifluoroethane		Xylenes	0.5
Ethanol		Styrene	
Acetone	0.4	2-Ethoxyethanol Acetate_	
Methylene Chloride	0.8	2-Butoxyethanol	
Isopropanol ·		Cyclohexanone	
Carbon Tetrachloride		Chlorobenzene	
Ethyl Acetate	0.2	o-Dichlorobenzene	
Methyl Ethyl Ketone	<u> </u>	Hydrocarbons (C7-16)	2
1,1,1-Trichloroethane		High-boiling organics	
Benzene		(B.P. > 290°C)	
Trichloroethylene		Other Solvents:	
Isobutanol		C3-Benzenes	0.5
N-Butanol	0-1		
Toluene			•
2-Ethoxyethanol			

Detection limit for individual components is approximately 0.1% by weight.

A Blank = Not Detected.

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`*	

SPECIAL WASTE ANALYSIS REPORT

(his Report is intended for the sole use and benefit of Waste Management and its companies.

His representation configurities of the reported data is made to any other parson or entity.

/6\	Waste Profile S	KEET CODE
	FROM SAMPLE C	L L L L

LABORATORY NAME			Management		36002285 PROF: ENR			
N .	18818	Alpannical	Censer		CE /ENDAGE TAGE		04/23/86	\$!
ADDRESS.		· · · · · · · · · · · · · · · · · · ·			CP/ENRAC EAST/RON EWARK, NJ	MIS		ì
DATE SAMPLE RECEP	VEDATLAB:				ECE. FAC COM			1
		:			RCE: ENC SITE: INC	ALA	004	ł
LABSAMPLE NUMBER CERTIFICATION Exce		d. all analytical	data reported below	were obtained	ULVENT SLUDGE/T15 under my direction and supervision, using sai	Most Bropstaine.		
analytical equipment (laboratory follows a q	specified or approve	d in the most rec	ant "Test Methods	for the Evaluatio	n of Solid Wasie, Physical/Chemical Methods	." SW 846, USEPA	Office of Solid Was	le This
	(101	91						·
DATE OF REPORT:	-9/7/			\$1 G	NATURE:	Tran		1
LAB MANAGER NAM	E:			_	NATURE: (b) . E.	IVER	~	·)
PHYSICAL CHARAC	TERISTICS OF WAST	E	Incl	dental				$\overline{}$
AMPLE VOLUME	COLOR			NONE	MILD PHYSICAL STATE . 70"F	LAYERS	FREE L	OUIDS
1	NEB	moun-	ug our	L. HOHE	\ \ \ \ .	MULTICA	AVERED	
	Dika	C 50. H	~ 1	STRONG	SOLID E SEMISOLI	D DE BI-LAYE	RED YE	: [] NO
	Glock	Som	DESCRIB	•	LIQUID D POWDER	1 7	PHASED VOLUM	=4L()~
	· · · · · · · · · · · · · · · · · · ·		1 06304181			12.5		
Tes	l	AS Received	Extraction Procedure	Date of Analysis	Test	As Received	Extraction Procedure	Date of Analysis
ecific Gravity		0.96		2.1.2.170.12		1.000.00	7.0000016	Allelysis
(_ 	NIA						
Idity % as		 ~ / ~ -						
halinity % as					Phenois, mg/l			
O.6 4		 			Cyanides, as CN Total mg/l	410		
0.0					Cyanides, as CN Free mg/t			
tal Solids @ 105°C		60.439						
tal Dissolved Solid	mg/l				Nitrogen Ammonia, as N mg/l			
sidue on Evaporation					Total Kjeldahi Nitrogen as N mg/l			
	Q +40 03	10.32						
sh Point F*		K70			Total Alkalinity, P as CaCO, mg/l	1		
h Content, on ignit	ion (%)	4.687			Total Alkalinity M as CaCO,, mg/l			
ating Value, BTU/II		3462.			Total Hardness as CaCO, mg/l			
cld Scrub." gNath	122	N 1 10	: 4		Calcium Hardness, as CaCO mg/l	İ		
Umine		628.			Magnesium Hardness, as CaCO, mg/l			
senic, as As, mg/l	110001	1 35						
rium, as Ba, mg/l		570.						
mlym as Br, mg/l					Oli and Grease, mg/L =/6	25.14		
dmium, as Cd, mg/	1	52.4	/					
romium, Total as C		540.						
zavalent Chromium					Aldrin, mg/l			
pper, as Cu, mg/l		187.			Chlordane, mg/1		·	
n. Total as Fe, mg/					DDT , mg/l	1		
, dissolved, as Fe,	mg/l				Dieldrin, mg/l			
d. es Pb, mg/l		1840.			Endrin, mg/l			
nganese, as Mn, ff	ng/t				Heptachior, mg/l			
gnesium, as Mg, m			,		Lindane, mg/l			
cury, as Mg, mg/l		374.			Methoxychlor, mg/l-			
kel, as Ni, mg/l		25.1			Toxaphene, mg/l			
enium, as Se. mg/l		3.00			Parathion, mg/l			
ngn teres		40.15			2,4, D. mg/l		0(0282
c. as		989.			2.4. & IP (Silver), mgH FEG MX F	in this wa	~ 191.	
عمد السد	mas BF.	1.38		4	PCB's mail TOTHL	191,		
taisaint		02.7			ECB Arek Arealier 1242	76	1	
arbonales, as HCC	, mg/l				Both Hauric	- Vari	とてして	<u></u>
tal Sulfur	mg/1	47 <i>6</i> 3.			Hevats 1			`
orides, as Cl. mg/l	TCHP	13600			()			
urides, as F, mg/l		87			Sodium GONA	21.45		

SECRETES PROF. ENR SCP/ENRAC EAST/RON MIS NEWARK, NJ SRCE: ENC SITE: INC ALA SOLVENT SLUDGE/T15

WEIGHT & SOLVENTS

•		
Trichlorofluoromethane		Methyl Isobutyl Ketone
Ethyl Ether		Tetrachloroethylene 0.2
Methanol	· ,	Butyl Acetate 0.1
1,1,2-Trichloro-1,2,2-		Ethylbenzene 0.3
trifluoroethane	·	Xylenes
Ethanol		Styrene
Acetone	0.3	2-Ethoxyethanol Acetate
Methylene Chloride	2	2-Butoxyethanol
Isopropanol .		Cyclohexanone
Carbon Tetrachloride		Chlorobenzene
Ethyl Acetate	·	o-Dichlorobenzene
Methyl Ethyl Ketone		Hydrocarbons (7-20
l,1,1-Trichloroethane		High-boiling organics
Benzene	0.05	(B.P. >290°C) 0.5
Prichloroethylene		Other Solvents:
Isobutanol		Methylethylacetate al
W-Butanol	0.1	Benzenes 1 Benzene methanol 0.2
Toluene	2	Phene 1 0.05 Isonhuran « C.i
?-Ethoxyethanol		Naphthokue 0.03 Renz sur 2,4-dichlore-Itchlorene C. 2
•		Benzame actic acid 0.2
Detection limit for indiv	idual components i	is approximately 0.1% by weight.
A Blank & Not Detected		

•		•		-1	ラー				
SPECIAL V	ASTE A	ANAI YSI	SREPC	BT 6	MASTE	PROFILE GHEET C)		
his Report is Interced for	she sold use	and benefit of t	Verte Manage	ment and its companies.		7			
Stores benigate concarne	no siffilicans	a of the reported	data la made	to any other person or entity	FROM	SAMPLE CONTAIN			
	hariest W	2012					$-\!$		
ABORATORY NAME:	ABORATORY NAME: Chemical Waste Management 26002294 FROF: ENR SCP/ENRAC EAST/FON MTC 04/23/86								
boness Her	Macuul	ical Center I	·	SCP/ENRAC EAST/RON-NEWARK, NJ	I MIS	04/23/	ဗေ		
· ·	,								
BATE SAMPLE RECEIVED AT LAB:	: 1	4.1	- 114 - 11 - 114 	SRCE: END SITE: IN SOLVENT SLUDGE/TSE	C ALA	001			
LAS SAMPLE NUMBER ASSIGNED.						•			
CERTIFICATION Except as explicitly note analytical equipment specified or approve	id, all analytical : d in the most rec	data reported below ent "Test Methoda	r were obtained : for the Evaluatio	under my direction end supervision, using sem n of Solid Waste, Physical/Chemical Methods,"	ple preparation a SW 846, USEPA	nd anarysta Office of Eolid Was	d		
laborator follows a quality approprie cgf	trol program, inc	cluding a semple ch	ein of custody p	rocedure.			•		
DATE OF REPORT: 5/9/86 SIGNATURE: D. E. TURKE									
LAB MANAGER NAME:				0). E. /	Well	$\overline{}$			
							 -		
PHYSICAL CHARACTERISTICS OF WAST	<u> </u>	Incl	dental	•	T				
AMPLE VOLUME COLOR	. اسار	ODOR:	□ NONE	MILD PHYSICAL STATE . 70 F	LAYERS	∳ FREE LI	OUIDS		
10t LANCE D	Long:		STRONG	SOLID E SEMI SOLID	1 -	1 944	. □ NO		
1th, Bronn	sona:	- .	Solu	. *	TAN-BI-CATE	neu .	_		
· F	<u></u>	/ DESCRIBI	<u> </u>	J. Li-Liquid Li POWDER	I LI SINGLE	PHASED VOLUM	رعيه		
Test	As	Extraction	Date of	Test	As	Extraction	Date of		
nacilia Gravity	Received	Procedure	Analysis		Received	Procedure	Analysis		
HOYC Solis Time	6.0		<u></u>						
idity % as									
kalinity % sa				Phenois, mg/I					
O.D. mg/l	 				4105				
0.1/	1			Cyanides, as CN Free mg/l					
otal Sonus & 105°C	58.469								
otal Dissolved Solids mg/l				Nitrogen Ammonia, as N mg/l					
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ealing Value, BTW/b	13406			Total Hardness as CaCO, mg/l					
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omlum as Br. mg/l	1			Oil and Grease, mg# %	<u>57 9.</u>				
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Tech Center # 2284

04/23/86

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***** END OF PROJECT ****

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99926 PCB-1248

99927 PCB-1254

99928 PCB-1260

UO/KQ

UQ/KQ

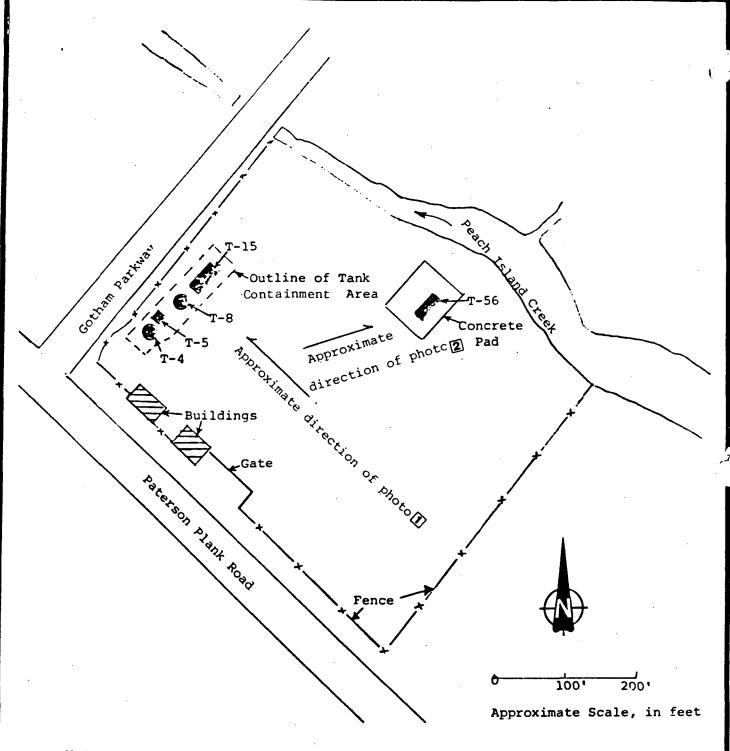
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UQ/KQ

UQ/KO

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APPENDIX 2 SITE PHOTOGRAPHS



Notes:

- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPAPM R. Harris	·
ा पुरुष्य हो । In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	TAT PM J. M. Simonsen	

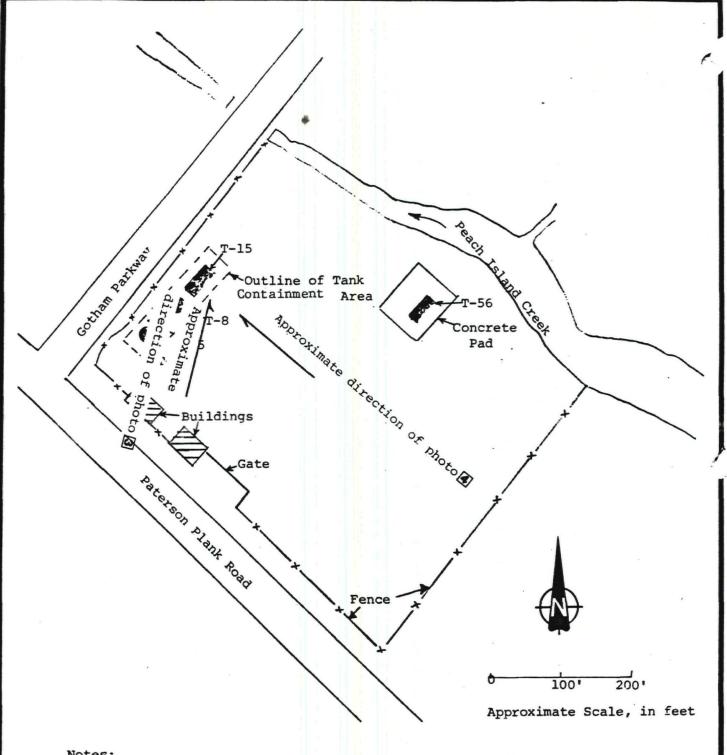
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PHOTO # 1: Carlstadt site, looking to the northwest. From left to right are tanks T-4, T-5, T-8, and T-15.



PHOTO # 2: Tank T-56, view is to the northeast.



Notes;

- 1) Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPAPM R. Harris	000000
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	000291



PHOTO # 3: Offloading of liquids from T-15 by vac-truck

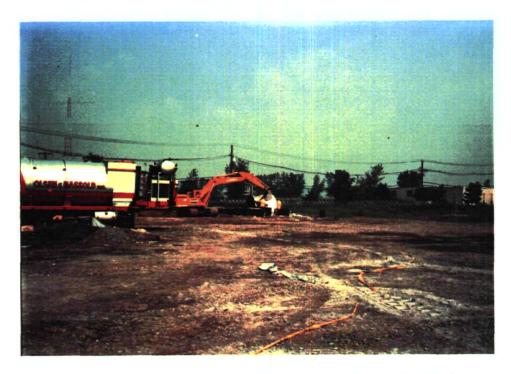
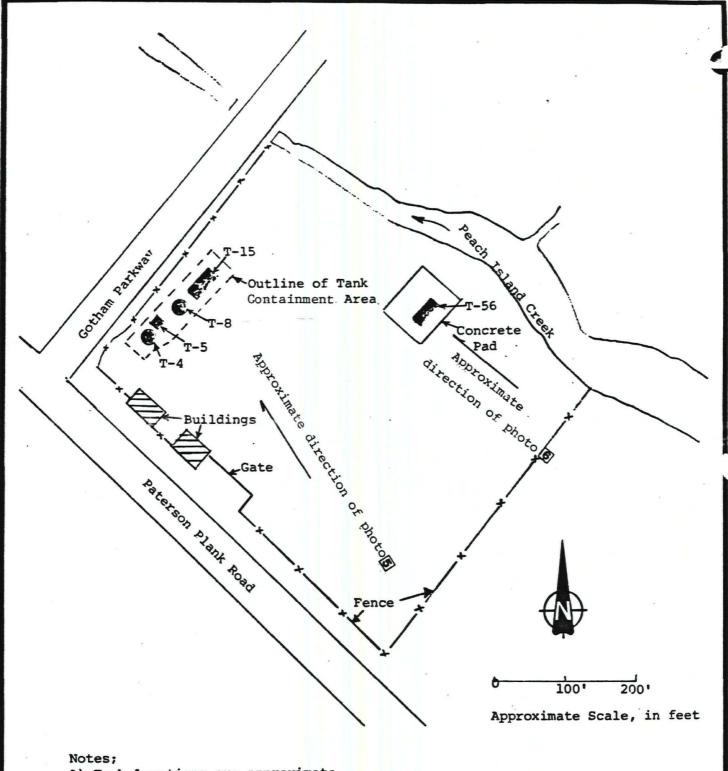


PHOTO # 4: T-15 sludge being removed by back-hoe. Note the hopper just below the back-hoe bucket.



- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

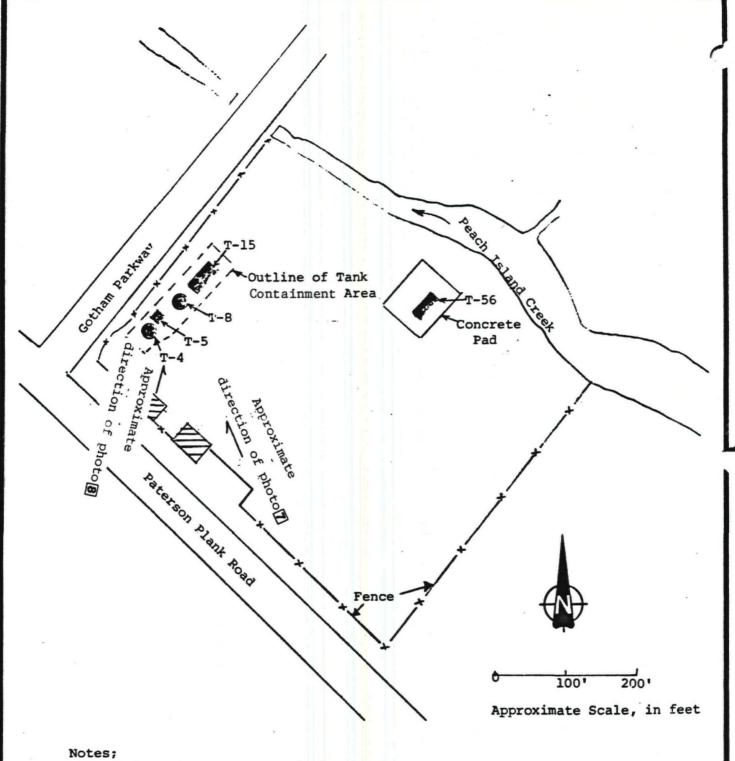
SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	R. Harris	-
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	000293



PHOTO # 5: Workers inspecting T-4 drums for stabilization.



PHOTO # 6: Tank T-56 sludge being removed by back-hoe.



- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100"

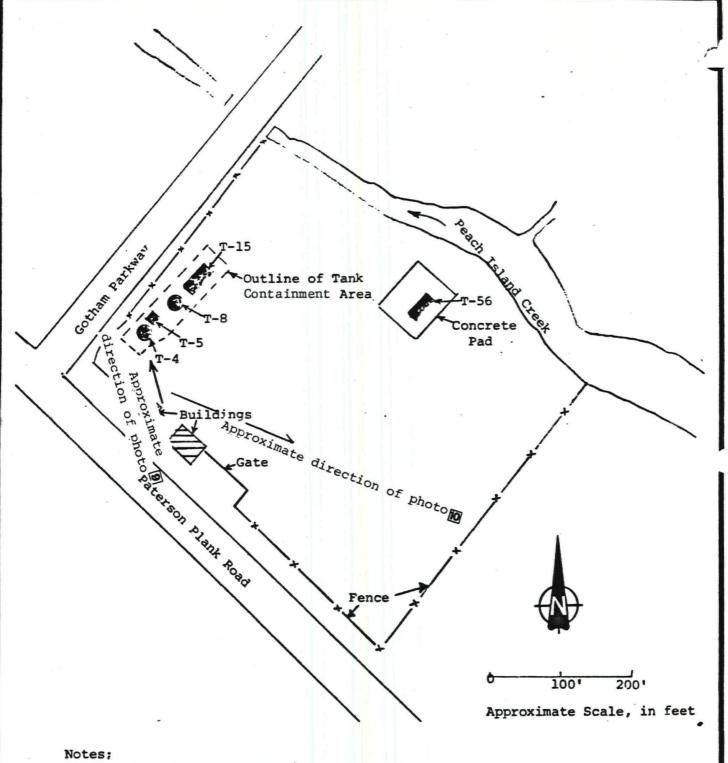
SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	R. Harris	
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	000295



PHOTO # 7: One of the covered roll-offs used for storage of low level solid wastes.



PHOTO # 8: Decontamination of tank parts, using T-15 as a catch basin. Note previously decontaminated tank parts resting on plastic in foreground.



- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

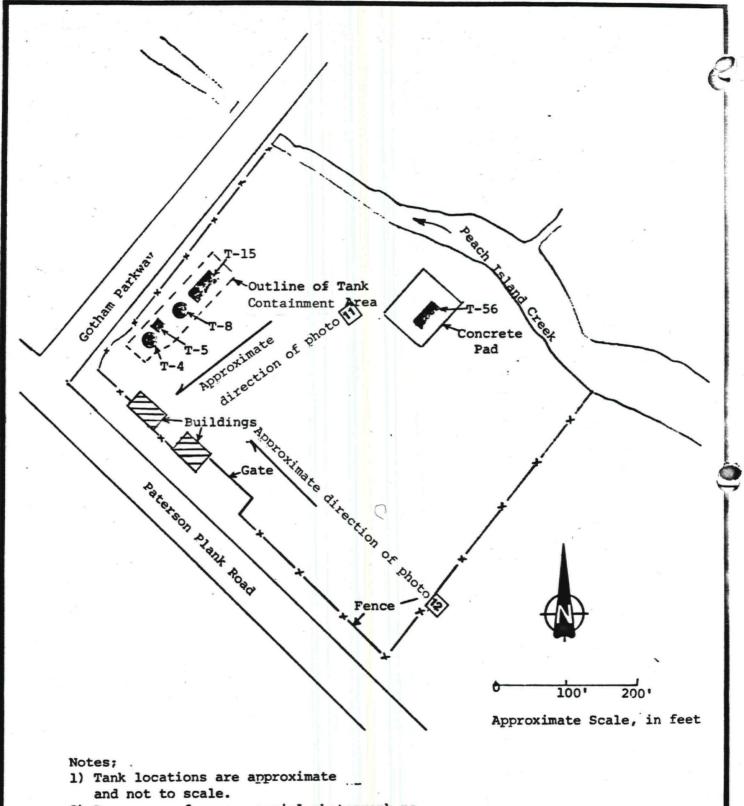
SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	R. Harris	-
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	000297



PHOTO # 9: Tank T-4 after decontamination, showing typical effectiveness of decontamination procedure. After this, cutting of the tank continued.



PHOTO # 10: Tank parts being loaded by scrap dealer for removal.



2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100"

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	R. Harris	
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	000299



PHOTO # 11: Spill which resulted when back of vac-truck was accidently opened by worker. Vacuuming of spill is in progress.



PHOTO # 12: Background: soil contaminated from above spill being stored on, and under, plastic sheeting. Construction of berm in progress. This soil was later transferred to roll-offs (see photo 7). Foreground: decontamination pad.

APPENDIX-3

DISPOSAL SUMMARY

APPENDIX 3

SUMMARY OF DISPOSAL METHODS

Material	PCB Level*	Container Type - Qua	antitý –	Disposal Method - Facility
Sludge, T-4	15 ppm	55 gallon steel drums	344**	Landfilled - Emelle, Alabama
Sludge, T-8	4,650 ppm	3.5 gallon buckets	1,027	Incineration - Chicago, Illinois
Sludge, T-15	132 ppm	55 gallon steel drums	344**	Landfilled - Emelle, Alabama
Sludge, T-56	1,240 ppm	30 gallon drum plastic	92	Incineration - Chicago, Illinois
Low Level, Solid debris	Variable, (<500 ppm)	30 cu. yd. rolloffs	3	Landfilled - Model City, New York

^{*}Based on Intec Lab results all arochlor types combined

^{**}Figure shows combined drum count for T-4 and T-15, see text.

APPENDIX-4

POLREPS

U.S. ENVIRONMENTAL PROTECTION ACENCY, REGION II

POLLUTION REPORT

DATE: September 23, 1986

Region II

Response and Prevention Branch

Edison, NJ 08837

(201) 548-8730 - Commercial & FTS

24 Hour Emergency

TO: C. Daggett, EPA

J. Marshall, EPA

F. Rubel, EPA

J. Feldstein, EPA

M. Randol, EPA

ERD, Washington, D.C.

(E-Mail)

G. Zachos, EPA

J. Berkowitz, NJDEP

J. Rogalski, NJDEP

A. Miller, DOI

B. Sprague, EPA

TAT

POLREP NO.:

Seven (7)

INCIDENT NAME: SCP Carlstadt-Cleanup

SITE/SPILL NO.: 65

POLLUTANT: PCB

CLASSIFICATION: Major

SOURCE:

Tanks on Site

LOCATION:

Carlstadt, New Jersey

AMOUNT:

N/A

WATER BODY:

Peach Island Creek

1. SITUATION:

A. During the period of September 6, 1986, to September 19, 1986, all of the stored and stabilized wastes for tanks T-8 and T-56 were removed for incineration. Total count for each tank was:

T-8 - 1,027 three and one-half gallon buckets

T-56 - 92 thirty gallon plastic drums

This completes the removal of sludges for these tanks.

B. Tanks T-8 and T-56 were dismantled and removed by a scrap dealer after wipe tests showed PCB values of less than 1 ppm. This completes the removal of tanks T-8 and T-56.

- C. Tank T-4 was knocked down, cut in half, hand scraped and washed down with a penatone and water solution which was run through a high pressure nozzle ("blaster"). A wipe sample has been taken and results are being awaited. Liquids previously in this tank are currently being stored in a tanker which also contains other low level contaminated water accumulated at the site.
- D. All low level solid waste (contaminated soil, plastic sheeting, etc.) has been removed for disposal at the Chemical Waste Management's Model City Landfill in New York.
- E. T-5 has been fenced off until work can begin on it's removal.

3. FUTURE PLANS AND RECOMMENDATIONS:

- A. Operations have temporarily ceased until the result of the wipe sample from T-4 is available and until weathertight containers for material in T-5 can be obtained.
- B. The tanker storing accumulated low level contaminated water is slated for removal on September 29, 1986.

FINAL POLREP	FURTHER POLREPS FORTHCOMING X	; SUBMITTED	BY: 11 1
			Robert Harris, OSC
(TAT)	•		Response and Pre-
	<i>;</i>		vention Branch
	~ v ·	DAME DELEAC	9/25-186

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

DATE: September 10 1986

J. Marshall, EPA

F. Rubel. EPA
J. Feldstein EPA

Region II
Response and Prevention Branch

Edison, NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

FTS

M. Randol, EPA ERD Washington D.C.

(E-Mail)

TO: C. Daggett, EPA

G. Zachos. EPA

J. Berkowitz. NJDEP

J. Rogalski NJDEP

A. Miller. DOI

B. Sprague. EPA

TAT

POLREP NO.: Six (6)

INCIDENT NAME SCP Carlstadt-Cleanup

SITE/SPILL NO. 65
POLLUTANT: PCB

CLASSIFICATION: Major

SOURCE Tanks on Site

LOCATION Carlstadt, New Jersey

AMOUNT: N/A

WATER BODY: Peach Island Creek

1. SITUATION

A. Responsible party removal continues. See previous POLREPS for details.

2. ACTION TAKEN

- A. During the period of September 2. 1986 to September 5, 1986 all of the steel drums storing waste from T-4 and T-15 were removed for disposal at the Emele Alabama Landfill Facility. Total drum count was 344.
- B. A bottle sample of the liquids used to decontaminate tanks T-4 and T-15 was collected and is being analyzed for PCB concentration.
- C. Tank T-56 was washed down with a penatone and water solution.
- D. Wipe samples for PCB concentrations were taken for T-8. T-15 and T-56.

3. FUTURE PLANS AND RECOMMENDATIONS:

- A. Material from T-8 and T-56 is awaiting removal for incineration and should occur in the next 1-2 weeks.
- B. Decontamination and subsequent removal of the tanks will continue.
- C. Material in T-5 will be removed and stored in a weathertight container until disposition of this material is decided upon.

FURTHER POLREPS

FINAL POLREP FORTHCOMING X

SUBMITTED BY:

(TAT)

Robert Harris, OSC Response and Prevention Branch

DATE RELEASED

000307

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

DATE: September 2, 1986

Region II Response and Prevention Branch Edison, NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

TO: C. Daggett, EPA
J. Marshall, EPA
F. Rubel, EPA
J. Feldstein EPA
J. Randall, EPA
M. Randol, EPA

ERD, Washington, D.C.

(E-Mail) G. Zachos, EPA

J. Berkowitz, NJDEP

J. Rogalski, NJDEP A. Miller. DOI

B. Sprague, EPA

TAT

POLREP NO.: Five (5)

INCIDENT NAME: SCP Carlstadt-Cleanup

SITE/SPILL NO.: 65
POLLUTANT: PCB
CLASSIFICATION: Major

CLASSIFICATION: Major

SOURCE: Tanks on Site

LOCATION: Carlstadt, New Jersey

AMOUNT: N/A WATER BODY: N/A

1. SITUATION:

A. Responsible party removal continues. See previous POLREPS for details.

2. ACTION TAKEN:

- A. During the period of August 2, 1986 to August 31, 1986, Tanks T-15, T-8, and T-56 were pumped free of sludge.
- B. Sludge from T-15 was mixed with kiln dust and stored in 178 55-gallon steel drums and are awaiting removal to a landfill.
- C. Sludge from T-8 was mixed with sawdust and placed in 1,027 3.5-gallon plastic buckets which have been stored pending removal for incineration.
- D. Sludge from T-56 was mixed with sawdust and placed in 84 30-gallon plastic drums which have been stored pending removal for incineration.
- E. Tank T-4 is being used to hold free liquids, such as

- F. A buried tank was discovered and has been excavated. This tank was open at the top and was filled with dirt and building debris. It is being viewed as contaminated.
- G. Two of the three roll-offs containing contaminated soil from the previous spill, and assorted solid contaminated material, have been removed and are being transported to the Model City Landfill for disposal.
- H. Decontamination of the tanks has begun. Tank pieces cut free from the main bodies of the various tanks have received an initial rinse with a penatone and water solution.

3. FUTURE PLANS AND RECOMMENDATIONS:

- A. Removal of material stored in steel drums should begin during the first week of September 1986.
- B. Decontamination of the tanks will continue.
- C. Liquids stored in T-4 will be removed for incineration.
- D. Material in Tank T-5 will be removed and stored in B-10 containers until disposition of this material can be decided upon.

	FURTHER		
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FINAL POLREP	FORTHCOMING X	SORWITTED	Robert Harris, OSC
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(TAT)			Response and Pre-
			vention Branch
	•	DATE RELEAS	SED715 184

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

DATE: August 4, 1986

Region II Response and Prevention Branch Edison, NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

TO: C. Daggett, EPA W. Librizzi, EPA F. Rubel, EPA J. Feldstein, EPA J. Marshall, EPA ERD, Washington, D.C. (E-Mail)

G. Zachos, EPA

J. Berkowitz, NJDEP

J. Rogalski, NJDEP

A. Miller, DOI B. Sprague, EPA

POLREP NO.: Four (4)

INCIDENT NAME: SCP Carlstadt-Cleanup

SITE/SPILL NO.: POLLUTANT: PCB CLASSIFICATION:

Major

Tanks on Site SOURCE: LOCATION: Carlstadt, New Jersey

AMOUNT: N/A

WATER BODY: N/A

1. SITUATION:

Responsible party removal continues. See previous POLREPS for details.

ACTION TAKEN: 2.

- During the week of July 28, 1986 to August 1, 1986, Tank T-4 has been pumped free of all its sludge. sludge has been mixed with kiln dust and placed into 55gallon steel drums, and is now awaiting removal.
- Tank T-15 has been partially pumped and has been handled in the same manner as T-4. Approximately 130 drums of material are now stored for removal.
- All of the contaminated soil from the spill of the previous week has been placed in lined and covered rolloffs. The rolloffs are being stored on site pending landfill acceptance and permits.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. The pumping of T-15 will continue to be followed by the pumping of the other tanks. The exact order of pumping is not scheduled but T-8 will probably be next, to be followed by T-56.

FINAL POLREP	FURTHER POLREPS FORTHCOMING X	_ SUBMITTED	BY: Brue Isram for Robert Harris, OSC
(TAT)			Response and Pre- vention Branch
		DATE RELEAS	SED 8/26/86

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

DATE: July 31, 1986

Region II
Response and Prevention Branch

Edison. NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

TO: C. Daggett, EPA
W. Librizzi, EPA
F. Rubel, EPA
J. Feldstein EPA

J. Marshall, EPA ERD, Washington, D.C.

(E-Mail)

G. Zachos, EPA

J. Berkowitz, NJDEP J. Rogalski. NJDEP

A. Miller, DOI

POLREP NO.:

INCIDENT NAME: SCP Carlstadt-Cleanup

Three (3)

SITE SPILL NO.: 65 FOLLSTANT: PCB

CLASSIFICATION: Major

SOURCE: Tanks on Site

LOCATION: Carlstadt. New Jersey

AMOUNT: N/A WATER BODY: N/A

1. SITUATION:

A. Responsible party removal continues. See previous POLREPS for details.

2. ACTION TAKEN:

- A. During the period of July 21 to July 25, 1986, tanks T-15, T-4 and T-56 were cut open for access.
- B. Most of the sludge in T-4 and some of T-15 was pumped out by a vac truck ("guzzler").
- C. A spill of pumped sludge occurred when the back of the vac truck was accidently opened. This spill was cleaned up immediately and is covered in detail under a separate POLREP. Contaminated soil from this spill is being stored in a covered roll-off until it can be removed.
- D. Seventy drums of sludge, stabilized with kiln dust, have been filled and are being stored for removal.

FUTURE PLANS AND RECOMMENDATIONS:

The pumping of sludge from tanks T-4 and T-15 is expected to continue, as will the mixing of kiln dust for stabilization and the storage of contaminant in steel drums pending final removal.

> FURTHER POLREPS

FINAL POLREP FORTHCOMING X SUBMITTED BY:

(TAT)

Robert Harris, OSC Response and Prevention Branch

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

TO:

DATE: July 21, 1986

Region II
Response and Prevention Branch

Edison, NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

C. Daggett, EPA
W. Librizzi, EPA
F. Rubel, EPA
J. Feldstein, EPA

J. Marshall, EPA ERD, Washington, D.C.

(E-Mail) G. Zachos, EPA

J. Berkowitz, NJDEP J. Rogalski, NJDEP

A. Miller, DOI

POLREP NO.: Two (2)

INCIDENT NAME: SCP Carlstadt-Cleanup

SITE/SPILL NO.: 65
POLLUTANT: PCB
CLASSIFICATION: Major

SOURCE: Tanks on Site

LOCATION: Carlstadt, New Jersey

AMOUNT: N/A WATER BODY: N/A

1. SITUATION:

A. A responsible party cleanup of PCB contaminated liquid and sludge has commenced at a former Scientific Chemical Processing Plant in Carlstadt, New Jersey. For more detail, see previous POLREP.

2. ACTION TAKEN:

- A. Samples of all five tanks were taken on April 18, 1986. Results show very high concentrations of PCB, as well as high concentrations of mercury, lead and chromium.
- B. During the period of July 14-18, 1986, Inmar and Associates contracted Chemical Waste Management to clean and remove five tanks containing contaminated sludge and liquid. Final disposal of the contaminates is still unsettled.
- C. Chemical Waste Management has delineated a hot zone, drum storage zone, contamination reduction zones, support area and command post. Appropriate signs warning of entry and prohibiting smoking have been posted.

- Tank T8 has had it's top removed and been pumped free of liquids. The liquids are being stored in 55 gallon steel drums until removal from the site can be effected.
- Tank T56 has been pumped in the same manner, however, the rubber lining in the tank has deteriorated and rubber debris has been clogging the pump. Some liquid remains, but will probably be removed on the next working day.

3. FUTURE PLANS AND RECOMMENDATIONS:

A. Cleanup activity will continue and will take about another month. The tanks will be cut by cold saw in the near future, but the exact date is uncertain due to difficulty in obtaining experienced cutting personnel.

> **FURTHER** POLREPS

FINAL POLREP

FORTHCOMING X SUBMITTED BY:

(TAT)

Robert Harris, OSC Response and Prevention Branch

DATE RELEASED

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION II

POLLUTION REPORT

DATE: April 11, 1986

Region II Response and Prevention Branch

Edison, NJ 08837

(201) 548-8730 - Commercial & FTS 24 Hour Emergency

TO: C. Daggett, EPA W. Librizzi, EPA. F. Rubel, EPA J. Feldstein, EPA

J. Marshall, EPA ERD, Washington, D.C.

(E-Mail)

G. Zachos, EPA

J. Berkowitz, NJDEP J. Rogalski, NJDEP

A. Miller, DOI

POLREP NO.: One (1)

INCIDENT NAME: SCP Carlstadt-Cleanup

SITE/SPILL NO.: 65 POLLUTANT: PCB CLASSIFICATION: Major

SOURCE:

Tanks on Site LOCATION: Carlstadt, New Jersey

AMOUNT: N/A WATER BODY: N/A

1. SITUATION:

- Four above ground storage tanks and one tank trailer containing PCB contaminated liquid and sludge have been left abandoned at a former waste treatment facility formerly operated by Scientific Chemical Processing (SCP), which had leased the area from Inmar Associates.
- An estimated 34,720 gallons of material occupy the tanks and, although not directly observed, are believed to be leaking because stained ground has been observed around the tanks.
- Removal is being effected by the responsible party, Index Associates through a private contractor, Chemical Waste Management, Incorporated.

2. ACTION TAKEN:

- A. During the period of April 2, 1986, through April 10, 1986, three truckloads of liquid waste, each about 4,500 gallons, were removed from the site by the responsible party and taken to Chicago for incineration.
- B. Almost all of the liquid has been removed and most of what remains is sludge.

3. FUTURE PLANS AND RECOMMENDATIONS:

- A. Sampling of the sludge will take place in about two weeks.
- B. Steve O'Reilly of Inmar Associates (the responsible party) has requested that prior to sampling, representative of, or for, the EPA examine the site with responsible party representatives to review and agree on procedures.
- C. Peter Martorano, Carlstadt Fire Officials, has requested he be notified whenever removal activity is taking place at the site. His phone number is (201) 939-1777.

FURTHER POLREPS FINAL POLREP FORTHCOMING X SUBMITTED (TAT)	BY: Robert Harris, OSC Response and Prevention Branch
---	---

DATE RELEASED 5-5-86

APPENDIX 5
STATUS OF TANK T-5

T-5 STATUS

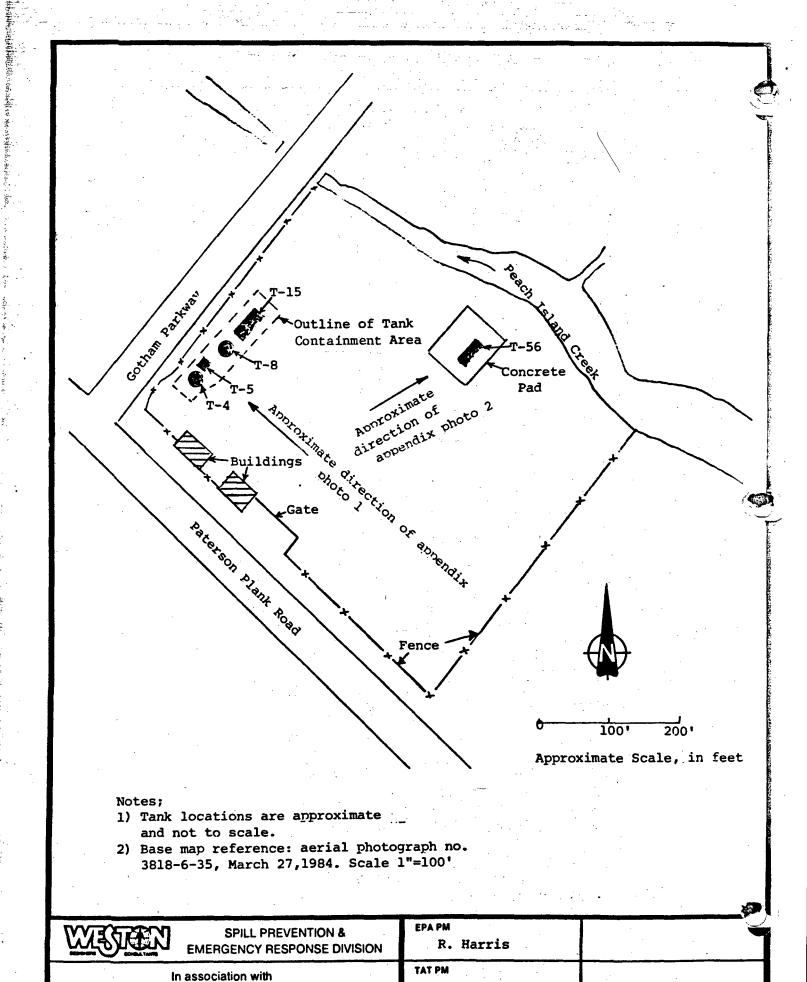
Tank T-5 sludge continues to present a "Catch-22" disposal problem: its PCB concentration (32,000+ ppm), it too high for disposal by landfilling, but it can not be incinerated because of its high heavy metal content (50,700 ppm lead, plus noteable amounts of mercury, cadmium, and chromium). Inmar Associates had proposed landfilling of the sludges, however, this idea has been rejected by the EPA.

Because the presence of T-5 was delaying the start of the remedial investigation, and because T-5 was leaking. Inmar was instructed to re-package the sludge in a safe container until a disposal method could be decided upon. This, however, was not done until December 15, 1986, the final deadline given to Inmar in a December 4 letter from the EPA Office of Regional Counsel. On that day, a TAT member visited the site and found the tank to have been placed in a roll-off, which had been lined with plastic, and covered with a heavy-duty tarp. The roll-off/T-5 combination had been placed on the concrete pad formerly occupied by Tank T-56. The OSC subsequently visited the site, and determined that this arrangement would be satisfactory.

In the interim, because of the long delay on the part of Inmar to take any action regarding this tank, EPA began to make plans for an emergency removal of the tank and it's sludge. This effort was cut short when T-5 was placed into the roll-off.

Also in the interim, the OSC requested TAT study the problem to determine if alternative disposal methods were available, and to recommend the best alternative for this situation. This study, unfortunately, did not offer any new, or better, alternatives.

Correspondence concerning these matters, and photos of the T-5/roll-off combination, are presented in this appendix.



J. M. Simonsen

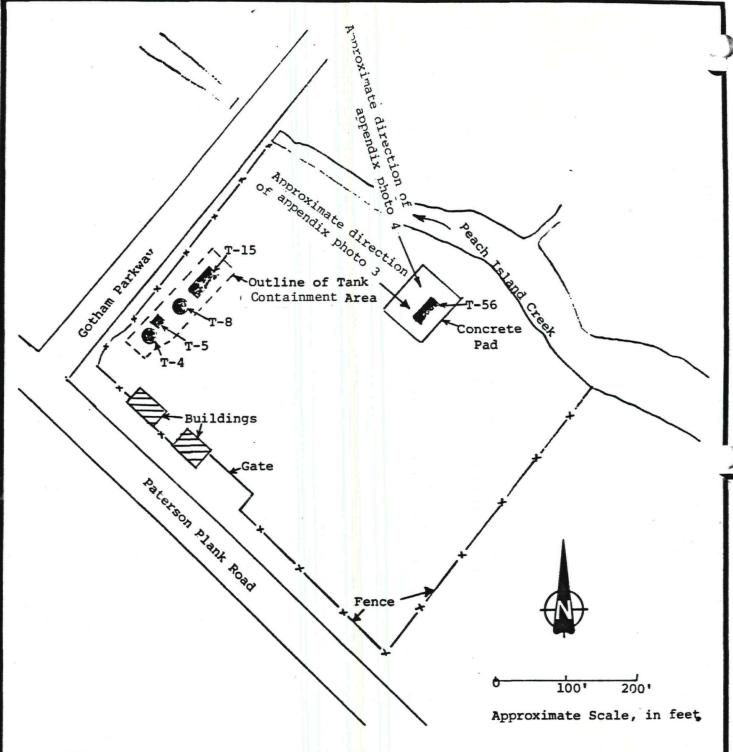
ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.



APPENDIX 5, PHOTO 1: Site formerly occupied by T-5. View is toward the northwest, Gotham Parkway is in the



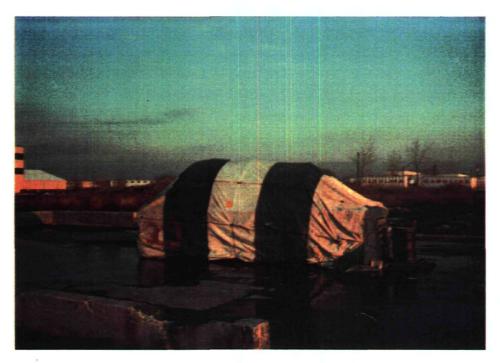
APPENDIX 5, PHOTO 2: T-5 at its new location: the concrete pad formerly occupied by T-56 (compare with photo 2 of main text). View is to the northeast.



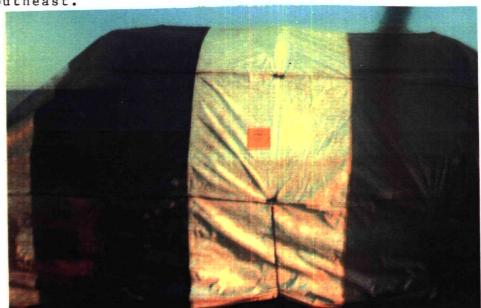
Notes;

- Tank locations are approximate and not to scale.
- 2) Base map reference: aerial photograph no. 3818-6-35, March 27,1984. Scale 1"=100'

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	R. Harris	- 000321
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. M. Simonsen	v



APPENDIX 5, PHOTO 3: T-5/roll-off combination on concrete pad. Outline of roll-off visible under tarp. View is to southeast.



APPENDIX 5, PHOTO 4: Close up of T-5/roll-off combination. Note PCB warning label and outline of roll-off under tarp. View is to southeast.

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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION EPA CONTRACT 68-01-6669

TAT-02-F-03235

MEMORANDUM

TO:

Bob Harris

Response and Prevention Branch, U.S. EPA

FROM:

Jeffrey Simonsen, TAT PM JMS

William Kowalski, TAT QC wax

SUBJECT:

Disposal Options for T-5 Wastes,

SCP/Carlstadt

DATE:

October 8, 1986

As per your request (attachment to TDD #8610-18) I have studied the Hazardous Waste Evaluation and Disposal Criteria Operations Manual as it pertains to the disposal of the sludges from tank T-5 at SCP/Carlstadt. Unfortunately, because of the unique nature of the T-5 waste (high PCB and heavy metals), the report does not offer any real help. Wastes from T-5 are unique and, there is no procedure, technology, or technique outlined in the manual to handle this particular situation.

The following is a brief summary of what I have learned about the usual disposal techniques, as they would apply to T-5, based on my reading the report and extensive conversation with the authors.

Incineration - Because of the heavy metal content (lead, chromium, cadmium and mercury), it is unlikely T-5 waste will be accepted for incineration. All of the 3 available incinerators are currently operating with a six-month backlog and have indicated that the disruption of activity caused by incinerating this waste would be unacceptable. Additionally, incineration of this waste would release to the atmosphere a substantial amount of several highly toxic metal compounds and the change in the potential route of exposure could create a threat to health greater than that which currently exists.

- 2. Landfilling Although not permitted by EPA regulations (because of the high PCB level), it may be possible to obtain a variance and have the wastes landfilled. According to Chemical Waste Management personnel, their facility at Emelle, Alabama will accept the wastes in question.
- 3. On Site Treatment No technology for this is available.
- 4. Precipitation of Heavy Metals This is not believed to be feasible as the technology is very questionable, at best.

JS/WK:1s



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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION EPA CONTRACT 68-01-6669

TAT-02-F-03336

MEMORANDUM

TO:

Bob Harris

Response and Prevention Branch, U.S. EPA

FROM:

Jeff Simonsen, TAT II PM JS Bill Kowalski, TAT II QC wjk

SUBJECT:

SCP/Carlstadt, T-5

DATE:

December 16, 1986

As per our phone conversation relating to TDD #8612-17, in anticipation of a CERCLA removal of tank T-5, I have been examining removal options so that the underground investigation may begin.

I recommend that T-5 be placed into another vessel: in this way the threat of leakage onto the site is removed, the tank can be placed out of the way of the investigation crews, and there is a minimum of materials handling.

Because the disposal method for T-5 has not yet been decided upon, transferring T-5's material to either drums or bulk containers may be a waste of time, money and effort. If the material is transferred to bulk containers, and it is later decided that it must be placed into drums, the bulking process will have been an unnecessary and expensive intermediate step. Conversely, if the material is placed into drums when it could have been bulked, that will have been a very expensive, unnecessary intermediate step, as well as having increased the level of exposure to workers, and increasing the possibility of a release to the environment.

Placing T-5 into another container would take about one week, versus two weeks for bulk storage, and three weeks for drumming (see attached graph). The container could be built on site from standard steel plates welded into position, which should make the cost of the container competitive with the cost of the number of drums or bulk containers required. Additionally, because less equipment and fewer workers would be required (and all for substantially less time) this method should be a substantially less expensive intermediate step than the options of drumming or storing in bulk containers.

Attachments



CLIEN	IT/SUBJECTUSE	PA R. Harris / S	CP-Caristant	W.O. NO	
TASK	DESCRIPTIONRem	oval schedules for	r T-5, Various op	tions TAS	K NO
PREP.	ARED BY J.M. Simo	nsen DEPT	DATE	AP	PROVED BY
HTAM	CHECK BY	DEPT	DATE		
METH	OD REV. BY	DEPT	DATE	DEPT	DATE
			· · · · · · · · · · · · · · · · · · ·		
		DAYS			
	1 2 3 4 5	6 7 8 9 10 11 1	12 13 14 15 16		
REMOVAL METHOD					
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2nd vessel	vessel co	ons't.			
	transf	er of tank			·
	d	emobilization			
		- >			
ransfer to oulk	mobilization				
ontainers		repuration			
	>	nk cutting			
C		transfer of materi		•	
		material remova			
		decontaminati →			
		demobilizat	tion		
ransfer to	mobilization	•			
drums	site pre	paration		•	
		cutting			
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		demok	oilization		•
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f		•			*

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SHEET____ of

RFW 10-05-003/A-5/65

4 DEC 1985

EXPRUSS MAIL
RETURN RECEIPT REQUESTED

Ar. Steve O'Reilly Inmar Associates 1703 E. Second Strewt Scotch Plains, New Jersey 07076

Res Administrative Order Index No. II-CERCLA-50115 for the Scientific Chemical Processing ("SCP") Site 216 Paterson Plank Road Carlstadt, New Jersey 07376

Dear Nr. O'Reilly:

The purpose of this letter is to reiterate our concern about the presence of the PCB contaminated materials which remain in tank T5 on the SCP Carlstadt site and which presence constitutes a violation of the aforesentioned order.

As you are awars, the Administrative Order cited above which was issued to Inmar Associates ("Inmar") on October 23, 1965 mandated that Inmar accomplish proper offsite disposition of all tanks and trailers and their contents which existed on the SCP Carlstadt site. These activities were to be completed no later than two (2) souths after the commencement of work at the site.

Although work started at the site in Pebruary 1986, some removal activities which were mandated by the order have not yet been completed and, in the case of disposition of the tank T5 contents, have not yet even been started.

In our letter dated July 24, 1986, EPA had indicated to you that remedial activities could not proceed due to the presence of tank T5 and its contents on the site. We had also informed you that repackaging of the material in tank T5 might be needed in order to avoid any further delay(s) in starting remedial activities at the site.

By letter dated August 27, 1986, ZPA had mandated that Inwar immediately empty tank T5 and repackage its contents so that further investigations could proceed at the site. We had requested that this repackaging be completed within one (1) week after your receipt of that letter.

Finally, in our letter dated October 31, 1986, we once again urged Inmar to immediately repackage the contents of tank T5.

To date, your company has failed to properly dispose of or even repackage and relocate the PCB contaminated material in tank T5 so that other remedial actions could begin at the site. Your failure to empty tank T5, decontaminate and dispose of the tank and and repackage the PCB contents therein are clear violations of the order which was issued to Inmar in October 1985.

The presence of the PCB material in tank T5 at the SCP Carlstadt site constitutes an ongoing hazard to the public and an impediment to other investigatory and cleanup activities at the site.

We therefore demand that Inmar empty the contents from tank T5, properly decontaminate and provide for offsite disposal of the tank and repackage the PCB contaminated material therein on or before Monday, December 15, 1986.

If this work is not performed by this date, the Agency will take any actions needed to mitigate the hazard(s) which exist at the site and/or will initiate any enforcement action(s) it deems necessary.

Sincerely yours,

James P. Rooney Attorney Office of Regional Counsel

cc: Edward Egan, Esq.
Alfred Porro, Esq.
Christine Altomari, NJDEP
John Covino, NJAG

bcc: J. Feldstein R. Harris APPENDIX 6
SITE SAFETY PLAN

SITE SAFETY PLAN

Prior to the beginning of operations at the site, no site operations plan, including a safety plan, had been filed with the EPA. Because of concern by the EPA OSC, TAT developed a site safety plan for this project. A copy of this plan was given to Chem Waste Management, contractor to Inmar.

Chem Waste developed, and implemented its own site safety plan, which was quite similar to the TAT plan.



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TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION EPA CONTRACT 68-01-6669

TAT-02-F-03018

MEMORANDUM

Robert Harris

Response and Prevention Branch, U.S. EPA

FROM:

In Jeffrey Simonsen, TAT II Milel A. Such

SUBJECT:

SCP/Carlstadt Site Safety

TDD #2-8603-41A

DATE:

June 11, 1986

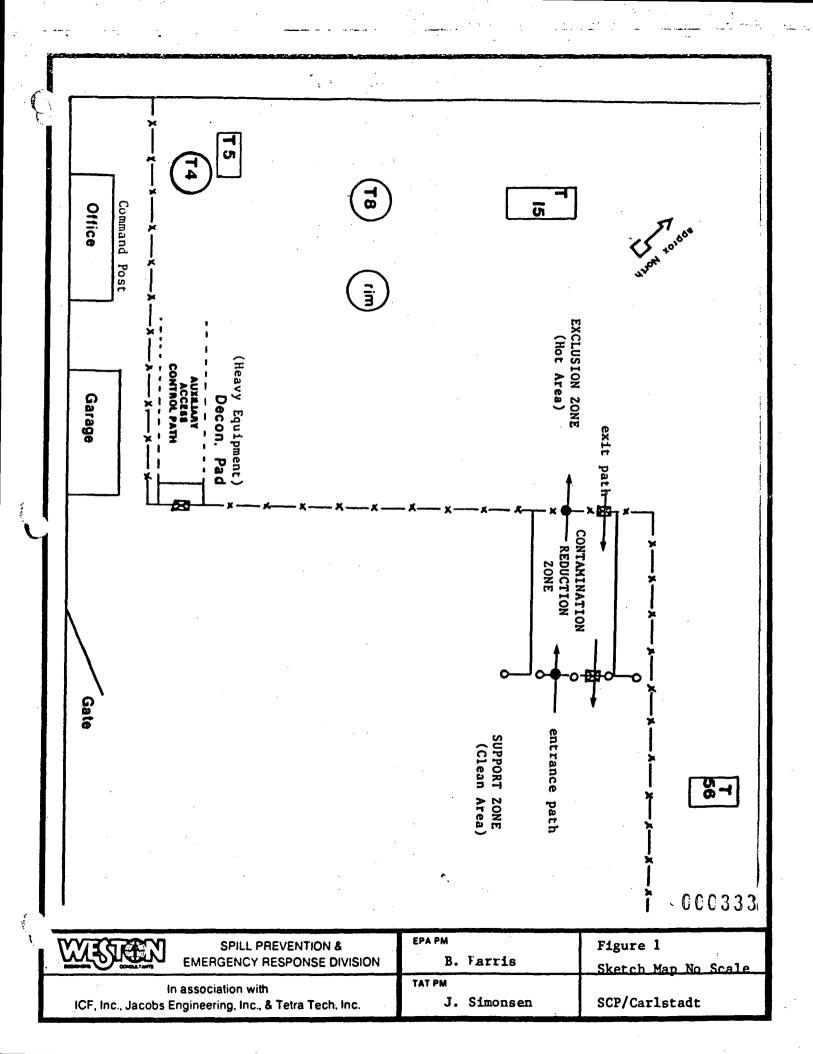
Attached are diagrams to show zoning and decontamination procedures for the above site. They are based on air sampling taken during two separate periods (during which time no readings above background were found), as well as a site examination by the TAT Regional Safety Officer.

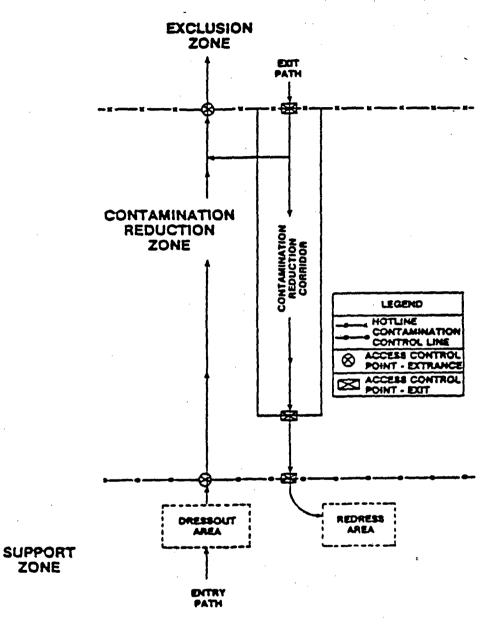
Figure 1 is an unscaled map showing the support, exclusion and contamination reduction zones.

Figure 2 shows the layout of the contamination reduction zone, including site entry and exit points, while Figures 3 and 4, respectively show the detailed steps for Level "C" and Level "B" contamination reduction.

Attachments

JS:1s

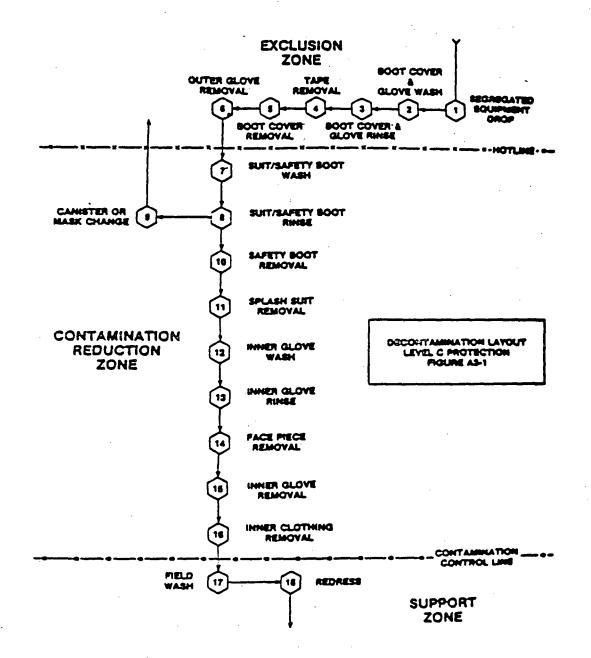




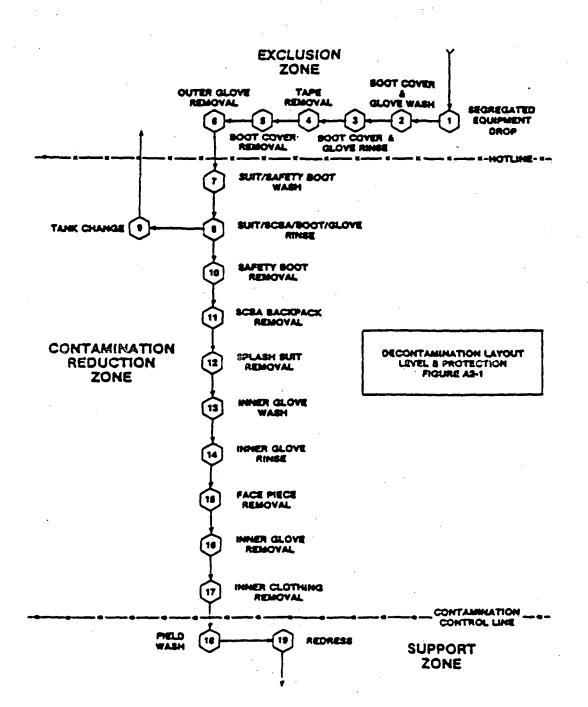
CONTAMINATION REDUCTION ZONE LAYOUT

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SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM B. Harris	Fig. 2
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.		Contamination Reduction Zone



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1	SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPAPM B. Harris	Figure 3 Level C Contamination
	In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	TAT PM J. Simonsen	Reduction Zone



CCC33G

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION	EPA PM B. Harris	Figure 4 Level B
In association with ICF, Inc., Jacobs Engineering, Inc., & Tetra Tech, Inc.	J. Simonsen	Contamination Reduction Zone